

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**SUMMONS**

KENNETH T. WALKER,

Plaintiff,

-against-

ANGELO PHILLIP LEE and FIRST CHOICE
TRANS, INC.,

Defendants.

Index No.:

Date Purchased/Filed:

Plaintiff designates Kings
County as the place of trial.**The basis of the venue is:**
Place of occurrence**Plaintiff resides at:**
4012 Vernon Blvd. Apt 1E
Brooklyn, New York 11101

To the above-named defendants,

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiffs' attorney within 30 days after the service of this summons, exclusive of the day of service; and in case of your failure to appear or answer judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
April 20, 2022/s/ Gennady VoldzGennady Voldz,
MORGAN & MORGAN NY PLLC
350 Fifth Avenue, Suite 6705
New York, NY 10018
(212) 738-6299**Defendants' addresses:**ANGELO PHILLIP LEE
717 Bridgeview Bay Lane
Norton Shores, MI 49441FIRST CHOICE TRANS, INC.
2080 Walnut Avenue
Hanover Park, IL 60133

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

KENNETH T. WALKER

Plaintiff,

-against-

ANGELO PHILLIP LEE and FIRST CHOICE
TRANS, INC.

Defendants.

Index No.:

VERIFIED
COMPLAINT

Plaintiff, by and through her attorneys, **Morgan and Morgan New York PLLC**,
complaining of the defendants herein, respectfully shows to the Court, and alleges as
follows upon information and belief:

AS AND FOR A FIRST CAUSE OF ACTION

1. That at all times hereinafter mentioned, plaintiff, KENNETH T. WALKER was,
and still is, resident of the State of New York, maintaining a residence at 4012 Vernon
Boulevard, Apt 1E, Brooklyn, New York 11101.
2. That at all times hereinafter mentioned, defendant, ANGELO PHILLIP LEE, was,
and still is, a resident of the State of Michigan, maintaining a residence at 717 Bridgeview
Bay Lane, Norton Shores, Michigan 49441.
3. That at all times herein mentioned, defendant, FIRST CHOICE TRANS, INC., was
and still is a domestic business corporation existing under the laws of the State of Illinois,
and duly licensed to conduct business in the State of New York.
4. Defendant, ANGELO PHILLIP LEE, was the driver and operator of a motor
vehicle bearing State of Illinois license plate number P980679.

5. Defendant, ANGELO PHILLIP LEE, was in physical charge with operating, management and control of the aforesaid motor vehicle owned by defendant, FIRST CHOICE TRANS, INC., with the knowledge, consent and permission, whether express or implied, of the defendant owner thereof.

6. That at all times hereinafter mentioned and on the 27TH day of September, 2021, defendant, FIRST CHOICE TRANS INC., was an owner, as defined in the Vehicle and Traffic Law Sec.128, of a certain motor vehicle known as a 2016 International bearing Illinois State plate number P980679.

7. That at all times hereinafter mentioned and on September 27, 2021, the plaintiff, KENNETH T. WALKER, was the driver, operator and owner of a motor vehicle bearing Virginia State license plate number UWM2448.

8. That on September 27, 2021, the plaintiff, KENNETH T. WALKER, was the driver of said motor vehicle bearing Virginia State license plate number UWM2448 upon the County of Kings, City and State of New York.

9. That on September 27, 2021, the defendant ANGELO PHILLIP LEE, was the driver of said motor vehicle bearing Illinois State license plate number P980679 upon the County of Kings, City and State of New York.

10. That on September 27, 2021, the plaintiff was parked on the shoulder of the entrance ramp at Atlantic Avenue on 2781 W/B Brooklyn Queens Expressway, in the County of Kings, City and State of New York when defendants aforesaid vehicle came into contact with plaintiff's parked vehicle.

11. That the aforesaid collision and injuries resulting therefrom, were due to the careless and negligent manner in which the defendants operated and controlled their said motor vehicle without the plaintiff in any way contributing thereto.

12. That by reason of the foregoing and the negligence of the said defendants, the plaintiff sustained serious, severe and permanent injuries to his neck, back, limbs and body, still suffers and will continue to suffer for some time, great physical and mental pain and serious bodily injury; became sick, sore, lame and disabled and so remained for a considerable length of time.

13. That by the reason of the foregoing and the negligence of the said defendants, the plaintiff was informed and verily believes that the aforesaid injuries are permanent and that he will permanently suffer from the effects of the aforesaid injuries and that he will be caused to suffer continuous pain and inconvenience.

14. That by reason of the foregoing, the plaintiff was compelled and did necessarily require medical aid and attention and did necessarily pay and become liable therefore, for medicines and other related medical expenses and upon information and belief, the plaintiff will necessarily incur similar expenses

15. That the plaintiff sustained serious injuries as defined in the Insurance Law of the State of New York Section 5102 and has sustained economic loss greater than basic economic loss as defined in the Insurance Law of the State of New York Section 5102.

AS AND FOR A SECOND CAUSE OF ACTION

16. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in paragraphs "01" through "15", inclusive, with the same force and affect as though the same were more fully set forth at length herein.

17. That defendants so carelessly and negligently operated their aforesaid motor vehicle so as to cause the aforesaid contact.

18. That as a result of the foregoing, this plaintiff's aforesaid vehicle was caused to and did sustain property damage and this plaintiff was required to seek and obtain mechanical attention in an effort to repair the damage.

19. That the aforesaid occurrence and property damage sustained by this plaintiff's vehicle was caused wholly and solely by the negligence of the defendants and not by any act or omission on the part of this plaintiff contributing thereto.

20. That by reason of the foregoing, plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE plaintiff, KENNETH WALKER, demands judgment against the defendants on his FIRST and SECOND Cause of Action, against defendants, ANGELO PHILLIP LEE and FIRST CHOICE TRANS, INC., in an amount to be determined at the time of trial, together with the costs and disbursements of this action.

Dated: New York, New York
April 20, 2022

Respectfully Submitted,

/s/ Gennady Voldz

GENNADY VOLDZ
MORGAN & MORGAN NY PLLC
350 Fifth Avenue Suite 6705
New York, New York
(212) 738-6299

ATTORNEY VERIFICATION

GENNADY VOLDZ, an attorney duly licensed to practice in the courts of the State of New York, hereby affirms the following under penalties of perjury:

That I am associated with the law firm of **MORGAN & MORGAN NY, PLLC** attorneys for the plaintiff in the within action; that I have read the foregoing **SUMMONS AND VERIFIED COMPLAINT** and know the contents thereof; and that the same is true to my own knowledge, except as to the matters therein alleged to be on information and belief, and as to those matters, I believe them to be true. The reason this Verification is made by me and not by the plaintiff is that said plaintiff resides outside of the County in which the Affirmant's office is located.

The grounds of my belief as to all matters stated upon my own knowledge are as follows: the records, reports, contracts, and/or documents contained in the plaintiff's file.

/s/ Gennady Voldz
GENNADY VOLDZ, ESQ.
MORGAN & MORGAN

Affirmed: April 20, 2022
New York, NY 10018